

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17-3283-LTS

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

PROMESA

Title III

Case No. 17-4780-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.  
REGARDING ITS REQUEST TO BE HEARD AT THE  
MAY 8, 2023 URGENT STATUS CONFERENCE**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order to Appear for Urgent Status Conference* (the “Order”) (ECF No. 24115 in

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Case No. 17-3283-LTS; ECF No. 3435 in Case No. 17-4780-LTS)<sup>2</sup> and respectfully states as follows:

2. Susheel Kirpalani and Eric Kay of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in person in the New York Courtroom.

3. Daniel Salinas and Kate Scherling of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear virtually through the Zoom platform.<sup>3</sup>

4. Mr. Kirpalani intends to be heard on any matter raised by or presented to the Court at the Urgent Status Conference, and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora.

5. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

6. The required Party Exhibit Cover Sheet accompanies this Informative Motion as Exhibit B.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Order.

<sup>3</sup> In addition, client representatives, Mr. Ted Lodge and Robby Tennenbaum, will appear at the Urgent Status Conference. Mr. Lodge will appear virtually through the Zoom Platform and Mr. Tennenbaum will appear in person in the New York Courtroom.

DATED: May 4, 2023

Respectfully submitted,

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

**By :** /s/ Rafael Escalera  
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*Co-Counsel for Syncora Guarantee, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz  
USDC-PR 303409

**EXHIBIT A**

**PARTY APPEARANCE SHEET**

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person/New York Courtroom
	Name	<b>Susheel Kirpalani</b>
	Email	susheelkirpalani@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7200
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 2	Appearance Method	In Person/New York Courtroom
	Name	<b>Eric Kay</b>
	Email	erickay@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7273
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 3	Appearance Method	Zoom
	Name	<b>Daniel Salinas</b>
	Email	danielsalinas@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	202-905-4668
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	Syncora/ Salinas, Daniel/ Quinn Emanuel Urquhart & Sullivan LLP
Attorney 4	Appearance Method	Zoom
	Name	<b>Kate Scherling</b>
	Email	katescherling@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7178
	Docket Entry No. of Notice of Appearance	Dkt No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	Syncora/ Scherling, Kate/ Quinn Emanuel Urquhart & Sullivan LLP

Participant 1	Appearance Method	Zoom
	Name	<b>Ted Lodge</b>
	Email	tlodge@goldentree.com
	Company	GoldenTree Asset Management
	Phone Number	212-847-3611
	Docket Entry No. of Notice of Appearance	N/A
	Zoom Screen Name	GoldenTree Asset Management/ Lodge, Ted
Participant 2	Appearance Method	In Person/New York Courtroom
	Name	<b>Robby Tennenbaum</b>
	Email	rtennenbaum@goldentree.com
	Company	GoldenTree Asset Management
	Phone Number	212-847-3439
	Docket Entry No. of Notice of Appearance	N/A
	Zoom Screen Name	N/A

**EXHIBIT B**

**PARTY EXHIBIT COVER SHEET**

N/A